



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, N.Y. 10007

MURIEL GOODE-TRUFANT  
Acting Corporation Counsel

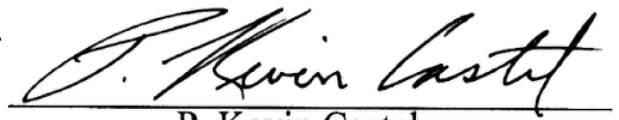
BRIAN FRANCOLLA  
Senior Corporation Counsel  
Tel.: (212) 356-3527  
Fax: (212) 356-3509  
bfrancol@law.nyc.gov

September 17, 2024

Revised schedule APPROVED. No further adjournments.  
Final Pretrial Conference adjourned from November 19 to  
December 18, 2024 at 11:00 a.m. in Courtroom 11D.  
SO ORDERED.  
Dated: 9/19/2024

**BY ECF**

Honorable P. Kevin Castel  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

  
P. Kevin Castel  
United States District Judge

Re: John Doe v. City of New York, et al., 22 CV 2690 (PKC) (KHP)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney representing defendant City of New York and NYPD Sergeant Richard Roe in the above-referenced action. In that capacity, I write jointly with plaintiff's counsel to respectfully request a brief adjournment of the parties' deadlines for pre-trial submissions as set forth via the Court's August 2, 2024 Order. The current schedule requires plaintiff's pre-trial submissions to be filed or provided to defense counsel on or before September 20, 2024; defendants' pre-trial submissions and responses to plaintiff's motions *in limine* to be filed or provided to plaintiff's counsel on or before October 18, 2024; and plaintiff's responses to defendants' motions *in limine* and the parties' proposed Joint Pre-trial Order to be filed on or before November 1, 2024. The parties respectfully request to briefly adjourn those deadlines as follows:

Plaintiff's pre-trial submissions:	October 2, 2024
Defendants' pre-trial submissions and responses to plaintiff's motions <i>in limine</i> :	October 30, 2024
Plaintiff's responses to defendants' motions <i>in limine</i> and proposed Joint Pre-trial Order:	November 13, 2024

The reason for this request is that this matter was reassigned to the undersigned yesterday and I will be taking it over completely from prior defense counsel for purposes of trial. The brief adjournment of the current pre-trial deadlines should afford sufficient time for

me to familiarize myself with the case and coordinate with plaintiff's counsel in getting this matter appropriately ready for trial.

Additionally, defendants request that the pre-trial conference, currently scheduled for November 19, 2024, be adjourned until a later date convenient to the Court after November 29, 2024. The reason for this request is that the undersigned is scheduled to begin a jury trial in the matter of the Estate of George Homer Tillman v. City of New York, et al., 18 CV 2211 (RPK) (JAM), before the Honorable Rachel P. Kovner, United States District Judge for the Eastern District of New York, beginning on November 18, 2024, and lasting until approximately November 29, 2024. Plaintiff's counsel consents to this request.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Brian Francolla  
Senior Counsel  
Special Federal Litigation Division

cc: All Counsel (By ECF)